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December 15, 2015

By ECF

Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Gonzalo Cortes, et al. v. City of New York, et al.,
1:14-cv-3014-SLT-RML

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of The City of New York, representing defendants in this action. I am writing to request a one-week extension of time to produce documents in accordance with Your Honor's Court Order of November 24, 2015. Plaintiff's counsel, Gabriel Harvis, consents to this request.

On November 24, 2015, Your Honor Ordered us to produce certain documents from the precinct relevant to this incident that occurred in July 2013. We have been making efforts to produce these documents or confirm that they do not exist, but certain documents remain outstanding. For example, according to officers at the 115th precinct, the telephone log and interrupted patrol log are no longer stored in the precinct but are stored off-site at a storage facility in New Jersey. While they have requested the documents, they have not yet been retrieved from storage. I have been told that they expect the documents within the next week and we will immediately produce them. I am therefore requesting an extension of time until December 22, 2015 to produce these documents. Thank you for your attention to this matter.

Respectfully submitted,

/s

Elissa B. Jacobs

cc: Gabriel Harvis Esq.
Attorney for Plaintiffs

By ECF